

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

TREBOR LENAILE CHATMAN

23-02473 - JAW

TRUSTEE'S NOTICE AND MOTION TO MODIFY

COMES NOW Harold J. Barkley, Jr, the duly appointed and qualified Standing Trustee in the above cause and moves to modify the above proceeding for reasons to be shown below.

1. The Debtor's Chapter 13 Plan was confirmed by Order of this Court entered on February 13, 2024.

2. That, the Debtor's plan proposes to pay Mac Haik a secured claim for a mechanic's lien. To date, said Creditor has failed to file a claim.

3. Therefore, the Debtor's Plan should be modified to remove the secured claim of Mac Haik and the Trustee should be authorized to make no payment on said claim.

4. That, the funds originally proposed on Mac Haik's secured claim should be applied as plan payments.

4. That, the Debtor's wage deduction order should remain unaltered and be honored until the Debtor has completed payments per the confirmed plan.

5. The indebtedness of those creditors not timely filing proof of claims should be paid \$0.00, and said indebtedness should be discharged upon completion of this plan.

6. **You are hereby notified** that all Objections must be made in writing to the Clerk of this Court. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U. S. Bankruptcy Court, U. S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.

7. **You are further notified** that all Objections must be made within thirty (30) days of this date, being **June 12, 2025**.

8. **You are further notified** that should no Objection be timely filed, the Court will be requested to enter an Order ex parte.

9. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion to Modify,

and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: May 13, 2025

Respectfully submitted,
/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR. - MSB #2008
CHAPTER 13 TRUSTEE
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C E R T I F I C A T E

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U S Trustee
ustpregion05.ja.ecf@usdoj.gov

Hon. Thomas carl Rollins, Jr.
trollins@therollinsfirm.com

Trebor Lenale Chatman
714 Witsell Road
Jackson, MS 39206

Mac Haik Ford
6130 I-55 North
Jackson, MS 39211

Dated: May 13, 2025

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.